

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
vs.)	No. 4:11 CR 404 HEA/FRB
)	
DOUGLAS PENNOCK,)	
)	
Defendant.)	

**DEFENDANT'S MOTION FOR ALLOWANCE
TO TRAVEL OUTSIDE OF THE DISTRICT**

Comes now defendant, Douglas Pennock, by and through counsel, Sean M. Vicente, Assistant Federal Public Defender, and moves this Court to allow the defendant to travel outside the district on October 21st and 22nd of 2011. In support of this motion, defendant states as follows:

1. The defendant is currently on \$10,000 unsecured bond and is being supervised by the Pretrial Services Office in the Central District of Illinois.
2. The defendant requests allowance to travel to the Northern District of Illinois to participate in a preplanned church activity. Counsel for the defendant has provided all relevant information, including where the defendant will be spending the night on October 21st, to Mr. Shae Rucker of the Pretrial Services Officer here in this district.
3. Defendant's counsel has spoken with the Mr. Brown, the Central District of Illinois Pretrial Supervision Officer, Mr. Rucker, and the assigned prosecutor, Mr. John Bodenhausen, and none of the concerned parties objects to Mr. Pennock's proposed travel plans.

4. Defendant realizes the serious nature of the charges and potential penalties but considering his pretrial compliance thus far combined with his absence of prior convictions he prays the court to allow him to travel outside the jurisdiction for the above noted activity.

WHEREFORE, Defendant Douglas Pennock prays the Court to allow travel outside the jurisdiction on the above noted dates.

Respectfully submitted,

/s/Sean M. Vicente
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2011 the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon John Bodenhausen Assistant United States Attorney.

/s/Sean M. Vicente
SEAN M. VICENTE
Assistant Federal Public Defender